

November 29, 2018

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
The Public Service Commission of South Carolina
101 Executive Center Dr., Ste. 100
Columbia, SC 29210

RE: Docket Numbers 2018-321-E and 2018-322-E

Dear Commissioners and Staff,

The Alliance of Automakers, Alliance of Global Automakers, American Honda Motor Co., Inc., Audi of America Inc., Ford Motor Company, General Motors LLC, Mitsubishi Motors, and Nissan North America would like to voice support for Duke Energy's plan to support transportation electrification. The Public Service Commission of South Carolina can help drive the growth of the electric vehicle (EV) market. We commend Duke Energy's proposed EV pilots included in **Dockets 2018-321-E and 2018-322-E**. The Duke Energy proposal is a responsible investment in EV infrastructure and technology demonstrations. This demonstration program will demonstrate that EVs offer benefits to all ratepayers.

There is a substantial and growing gap between the large number of EVs entering the market in the next five years and the infrastructure planned to support them. This is especially true with regard to the deployed or planned EV supply equipment (EVSE) in South Carolina. EV charging infrastructure will become more viable over time, but this early market requires direct utility investment to close the infrastructure gap and establish a network of charging stations that is highly visible to consumers. Consumers need a highly visible EVSE network to consider purchasing EVs, and once purchased, to confidently drive EVs around the state. Even as newer EVs are demonstrating longer driving ranges, the ability to drive with confidence relies on a robust EV charging infrastructure that will meet both daily driving with local Level 2 chargers and long distance travel needs with DC fast charging (DCFC).

Duke Energy's proposed EV infrastructure pilots address several elements critical to supporting a growing EV market, such as: public DCFC infrastructure, residential Level 2 rebates, and vehicle to grid (V2G)-enabled electric school buses.

First, the public DCFC infrastructure pilot serves a great need as the current public DCFC market is severely limited. The proposed 30 DCFC stations create a foundation that can enable a wide and accessible network for consumers, who often cite range anxiety as a major obstacle to making the switch from gas to electric vehicles. These stations, coordinated with Electrify America's plans, will create DCFC infrastructure along major highway corridors that will meet customers' long distance travel needs. In addition, these stations should be sited in specific areas that would optimize usage for EV drivers, especially for those without access to residential charging, and for transportation network company (TNC) drivers. Duke Energy's proposal on pricing appears sensible, as adjustments may be made over time with reports to the Commission. Automakers understand that DCFC can be expensive and difficult to locate for broad consumer use, but DCFC is vital to the overall EV charging system.

Second, the residential charging proposal provides a suitable rebate for a pilot phase. Data collection is essential to determining consumer charging behavior and grid benefits. This data also provides an opportunity to identify future public Level 2 infrastructure opportunities for vehicles to charge while parked not at home.

Finally, although automakers lack a direct stake in the electric school bus programs, we believe a V2G-enabled EV charging network can facilitate the transition to an electrified transportation market by allowing Duke Energy to study and test load management and other V2G grid services. Furthermore, we believe that this comprehensive portfolio approach is necessary to meet EV transportation needs of all communities, including low-income or disadvantaged communities, and those who rely on public transit.

Duke Energy can target infrastructure where it will benefit consumers most, and this effort will inform subsequent infrastructure programs in the area. Directly engaging the electric utility in strategic planning and execution of EV charging solutions ensures EV infrastructure is both cost-effective and enhances grid reliability.

In conclusion, the below-signed automakers greatly appreciate all efforts by The Public Service Commission of South Carolina to enable the strategic transition of transportation to electrification. We urge that you give prompt and positive consideration to this proposal, which we believe to be well balanced and in the public interest.

Sincerely,

Steve Douglas

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